

5.7 Greenhouse Gas Emissions

5.7 GREENHOUSE GAS EMISSIONS

This section evaluates greenhouse gas (GHG) emissions associated with the proposed project and analyzes project compliance with applicable regulations. Consideration of the project's consistency with applicable plans, policies, and regulations, as well as the introduction of new sources of GHGs, is included in this section. Greenhouse gas technical data is included as Appendix 11.6, *Air Quality/Greenhouse Gas Emissions Data*.

5.7.1 EXISTING SETTING

The project site lies within the southern portion of the South Coast Air Basin (Basin). The Basin is a 6,600-square mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Geronio Pass area in Riverside County. The Basin's terrain and geographical location (i.e., a coastal plain with connecting broad valleys and low hills) determine its distinctive climate.

The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. The climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and/or dispersion of pollutants throughout the Basin.

SCOPE OF ANALYSIS FOR CLIMATE CHANGE

The study area for climate change and the analysis of GHG emissions is broad as climate change is influenced by world-wide emissions and their global effects. However, the study area is also limited by the CEQA Guidelines [Section 15064(d)], which directs lead agencies to consider an "indirect physical change" only if that change is a reasonably foreseeable impact which may be caused by the project.

The baseline against which to compare potential impacts of the project includes the natural and anthropogenic drivers of global climate change, including world-wide GHG emissions from human activities that have grown more than 70 percent between 1970 and 2004. The State of California is leading the nation in managing GHG emissions. Accordingly, the impact analysis for this project relies on guidelines, analyses, policy, and plans for reducing GHG emissions established by the California Air Resources Board (CARB). This analysis also cites and relies on local air quality management district recommendations from the South Coast Air Quality Management District (SCAQMD) for CEQA assessment of GHG emissions.

GLOBAL CLIMATE CHANGE – GREENHOUSE GASES

The natural process through which heat is retained in the troposphere is called the “greenhouse effect.”¹ The greenhouse effect traps heat in the troposphere through a three fold process as follows: Short wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long wave radiation; and GHG in the upper atmosphere absorb this long wave radiation and emit this long wave radiation into space and toward the Earth. This “trapping” of the long wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect.

The most abundant GHGs are water vapor and carbon dioxide (CO₂). Many other trace gases have greater ability to absorb and re-radiate long wave radiation; however, these gases are not as plentiful. For this reason, and to gauge the potency of GHGs, scientists have established a Global Warming Potential (GWP) for each GHG based on its ability to absorb and re-radiate long wave radiation. The GWP of a gas is determined using CO₂ as the reference gas, which has a GWP of 1.

GHGs normally associated with the proposed project include the following:²

- Water Vapor (H₂O). Although water vapor has not received the scrutiny of other GHGs, it is the primary contributor to the greenhouse effect. Natural processes, such as evaporation from oceans and rivers, and transpiration from plants, contribute 90 percent and 10 percent of the water vapor in our atmosphere, respectively.

The primary human related source of water vapor comes from fuel combustion in motor vehicles; however, this is not believed to contribute a significant amount (less than one percent) to atmospheric concentrations of water vapor. The Intergovernmental Panel on Climate Change (IPCC) has not determined a Global Warming Potential for water vapor.

- Carbon Dioxide (CO₂). Carbon dioxide is primarily generated by fossil fuel combustion in stationary and mobile sources. Due to the emergence of industrial facilities and mobile sources in the past 250 years, the concentration of carbon dioxide in the atmosphere has increased 35 percent.³ Carbon dioxide is the most widely emitted GHG and is the reference gas (Global Warming Potential of 1) for determining Global Warming Potentials for other GHGs.
- Methane (CH₄). Methane is emitted from biogenic sources, incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. In the United States, the top three sources of methane are landfills, natural gas systems, and enteric fermentation. Methane is the primary component of natural gas, which is used for space and water heating, steam production, and power generation. The Global Warming Potential of methane is 21.

¹ The troposphere is the bottom layer of the atmosphere, which varies in height from the Earth’s surface to 10 to 12 kilometers.

² All Global Warming Potentials are given as 100 year GWP. Unless noted otherwise, all Global Warming Potentials were obtained from the Intergovernmental Panel on Climate Change. Climate Change (Intergovernmental Panel on Climate Change, *Climate Change, The Science of Climate Change – Contribution of Working Group I to the Second Assessment Report of the IPCC*, 1996).

³ United States Environmental Protection Agency, *Inventory of United States Greenhouse Gas Emissions and Sinks 1990 to 2004*, April 2006.

- Nitrous Oxide (N_2O). Nitrous oxide is produced by both natural and human related sources. Primary human related sources include agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. The Global Warming Potential of nitrous oxide is 310.
- Hydrofluorocarbons (HFCs). HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is growing, as the continued phase out of chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) gains momentum. The Global Warming Potential of HFCs range from 140 for HFC-152a to 11,700 for HFC-23.⁴
- Perfluorocarbons (PFCs). Perfluorocarbons are compounds consisting of carbon and fluorine. They are primarily created as a byproduct of aluminum production and semi conductor manufacturing. Perfluorocarbons are potent GHGs with a Global Warming Potential several thousand times that of carbon dioxide, depending on the specific PFC. Another area of concern regarding PFCs is their long atmospheric lifetime (up to 50,000 years).⁵ The Global Warming Potential of PFCs range from 6,500 to 9,200.
- Sulfur hexafluoride (SF_6). Sulfur hexafluoride is a colorless, odorless, nontoxic, nonflammable gas. It is most commonly used as an electrical insulator in high voltage equipment that transmits and distributes electricity. Sulfur hexafluoride is the most potent GHG that has been evaluated by the IPCC with a Global Warming Potential of 23,900. However, its global warming contribution is not as high as the Global Warming Potential would indicate due to its low mixing ratio compared to carbon dioxide (4 parts per trillion [ppt] in 1990 versus 365 parts per million [ppm], respectively).⁶

In addition to the six major GHGs discussed above (excluding water vapor), many other compounds have the potential to contribute to the greenhouse effect. Some of these substances were previously identified as stratospheric ozone (O_3) depleters; therefore, their gradual phase out is currently in effect. The following is a listing of these compounds:

- Hydrochlorofluorocarbons (HCFCs). HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, all developed countries that adhere to the Montreal Protocol are subject to a consumption cap and gradual phase out of HCFCs. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The Global Warming Potentials of HCFCs range from 93 for HCFC-123 to 2,000 for HCFC-142b.⁷

⁴ United States Environmental Protection Agency, *High GWP Gases and Climate Change*, June 22, 2010. <http://www.epa.gov/highgwp/scientific.html#hfc>.

⁵ United States Environmental Protection Agency, *High GWP Gases and Climate Change*, June 22, 2010. <http://www.epa.gov/highgwp/scientific.html#pfc>.

⁶ United States Environmental Protection Agency, *High GWP Gases and Climate Change*, June 22, 2010. <http://www.epa.gov/highgwp/scientific.html#sf6>.

⁷ United States Environmental Protection Agency, *Protection of Stratospheric Ozone: Listing of Global Warming Potential for Ozone Depleting Substances*, dated November 7, 2006. <http://www.epa.gov/EPA-AIR/1996/January/Day-19/pr-372.html>.

- 1,1,1 trichloroethane. 1,1,1 trichloroethane or methyl chloroform is a solvent and degreasing agent commonly used by manufacturers. The Global Warming Potential of methyl chloroform is 110 times that of carbon dioxide.⁸
- Chlorofluorocarbons (CFCs). CFCs are used as refrigerants, cleaning solvents, and aerosols spray propellants. CFCs were also part of the U.S. Environmental Protection Agency's (EPA) Final Rule (57 FR 3374) for the phase out of O₃ depleting substances. Currently, CFCs have been replaced by HFCs in cooling systems and a variety of alternatives for cleaning solvents. Nevertheless, CFCs remain suspended in the atmosphere contributing to the greenhouse effect. CFCs are potent GHGs with Global Warming Potentials ranging from 4,600 for CFC 11 to 14,000 for CFC 13.⁹

5.7.2 REGULATORY SETTING

FEDERAL

The Federal government is extensively engaged in international climate change activities in areas such as science, mitigation, and environmental monitoring. The EPA actively participates in multilateral and bilateral activities by establishing partnerships and providing leadership and technical expertise. Multilaterally, the United States is a strong supporter of activities under the United Nations Framework Convention on Climate Change (UNFCCC) and the IPCC.

In 1988, the United Nations and the World Meteorological Organization established the IPCC to assess the scientific, technical, and socioeconomic information relevant to understanding the scientific basis of human-induced climate change, its potential impacts, and options for adaptation and mitigation. The most recent reports of the IPCC have emphasized the scientific consensus around the evidence that real and measurable changes to the climate are occurring, that they are caused by human activity, and that significant adverse impacts on the environment, the economy, and human health and welfare are unavoidable.

In December 2007, Congress passed the first increase in corporate average fleet fuel economy (CAFE) standards. The new CAFE standards represent an increase to 35 miles per gallon (mpg) by 2020. In March 2009, the Obama Administration announced that for the 2011 model year, the standard for cars and light trucks will be 27.3 mpg, the standard for cars will be 30.2 mpg; and standard for trucks would be 24.1 mpg. Additionally, in May 2009 President Barack Obama announced plans for a national fuel-economy and GHG emissions standard that would significantly increase mileage requirements for cars and trucks by 2016. The new requirements represent an average standard of 39 mpg for cars and 30 mpg for trucks by 2016.

In September 2009, the EPA finalized a GHG reporting and monitoring system that began on January 1, 2010. In general, this national reporting requirement will provide the EPA with accurate and timely GHG emissions data from facilities that emit 25,000 metric tons (MT) or more of CO₂ per year. This publicly available data will allow the reporters to track their own emissions, compare them to similar facilities, and aid in identifying cost-effective emissions reduction strategies. This

⁸ Ibid.

⁹ United States Environmental Protection Agency, *Class I Ozone Depleting Substances*, March 7, 2006. <http://www.epa.gov/ozone/ods.html>.

new program covers approximately 85 percent of the nation's GHG emissions and applies to approximately 10,000 facilities. The reporting system is intended to provide a better understanding of where GHGs are coming from and will guide development of the best possible policies and programs to reduce emissions.

Currently, the EPA is moving forward with two key climate change regulatory proposals, one to establish a mandatory GHG reporting system and one to address the 2007 Supreme Court decision in *Massachusetts v. EPA* (Supreme Court Case 05-1120) regarding the EPA's obligation to make an endangerment finding under Section 202(a) of the Federal Clean Air Act (FCAA) with respect to GHGs. *Massachusetts v. EPA* was argued before the United States Supreme Court on November 29, 2006. Under the FCAA, the EPA is now obligated to issue rules regulating global warming pollution from all major sources. In April 2009, the EPA concluded that GHGs are a danger to public health and welfare, establishing the basis for GHG regulation. However, as of January 2011 there are no Federal regulations or policies regarding GHG emissions applicable to the proposed project.

STATE

CARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA), which was adopted in 1988. Various statewide and local initiatives to reduce the state's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term.

Assembly Bill 1493. In response to the transportation sector accounting for more than half of California's CO₂ emissions, Assembly Bill (AB) 1493 (AB 1493, Pavley) was enacted on July 22, 2002. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light duty trucks, and other vehicles whose primary use is noncommercial personal transportation in the State. The bill required that CARB set the GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. In setting these standards, CARB must consider cost effectiveness, technological feasibility, economic impacts, and provide maximum flexibility to manufacturers. CARB adopted the standards in September 2004. (See Title 13, Cal. Code of Regs., § 1900, 1961.) Amendments to CCR Title 13, Sections 1900 and 1961 (13 CCR 1900, 1961), and adoption of Section 1961.1 (13 CCR 1961.1) require automobile manufacturers to meet fleet-average GHG emissions limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty passenger vehicle weight classes (i.e., any medium-duty vehicle with a gross vehicle weight rating less than 10,000 pounds that is designed primarily for the transportation of persons), beginning with the 2009 model year. For passenger cars and light-duty trucks with a loaded vehicle weight (LVW) of 3,750 pounds or less, the GHG emission limits for the 2016 model year are approximately 37 percent lower than the limits for the first year of the regulations, the 2009 model year. For light-duty trucks with LVW of 3,751 pounds to gross vehicle weight (GVW) of 8,500 pounds, as well as medium-duty passenger vehicles, GHG emissions would be reduced approximately 24 percent between 2009 and 2016. These standards are intended to reduce emissions of carbon dioxide and other GHGs (i.e., nitrous oxide and methane). Some currently used technologies that achieve GHG reductions include small engines with superchargers, continuously variable transmissions, and hybrid electric drive.

In December 2004, a group of car dealerships, automobile manufacturers, and trade groups representing automobile manufacturers filed suit against CARB to prevent enforcement of 13 CCR Sections 1900 and 1961 as amended by AB 1493 and 13 CCR 1961.1 (*Central Valley Chrysler-Jeep et al. v. Catherine E. Witherspoon, in Her Official Capacity as Executive Director of the California Air Resources Board, et al.*). The automobile-makers' suit in the U.S. District Court for the Eastern District of California, contended California's implementation of regulations that, in effect, regulate vehicle fuel economy, violates various Federal laws, regulations, and policies.

On December 12, 2007, the court found that if California receives appropriate authorization from the EPA (the last remaining factor in enforcing the standard), then these regulations would be consistent with and have the force of Federal law, thus, rejecting the automobile-makers' claim. This authorization to implement more stringent standards in California was requested in the form of a FCAA Section 209(b), waiver in 2005. Since that time, the EPA failed to act on granting California authorization to implement the standards. Then Governor Schwarzenegger and then Attorney General Edmund G. Brown filed suit against EPA for the delay. In December 2007, EPA Administrator Stephen Johnson denied California's request for the waiver to implement AB 1493. Johnson cited the need for a national approach to reducing GHG emissions, the lack of a "need to meet compelling and extraordinary conditions," and the emissions reductions that would be achieved through the Energy Independence and Security Act of 2007 as the reasoning for the denial (Office of the White House, 2009).

The State of California filed suit against the EPA for its decision to deny the FCAA waiver. The change in presidential administration resulted in the EPA reexamining its position for denial of California's FCAA waiver and for its past opposition to GHG emissions regulation. California received the waiver on June 30, 2009.

Assembly Bill 32. The Legislature enacted AB 32 (AB 32, Nuñez), the California Global Warming Solutions Act of 2006, which was signed on September 27, 2006 to further the goals of Executive Order S-3-05. (Health & Safety Code, § 38500 et seq.) AB 32 requires CARB to adopt statewide GHG emissions limits to achieve statewide GHG emissions levels realized in 1990 by 2020. A longer-range goal requires an 80 percent reduction in GHG emissions from 1990 levels by 2050. CARB adopted the 2020 statewide target and mandatory reporting requirements in December 2007, and a statewide scoping plan in December 2008 (the AB 32 Scoping Plan). AB 32 represents the first enforceable statewide program to limit GHG emissions from all major industries, with penalties for noncompliance. CARB has been assigned to carry out and develop the programs and requirements necessary to achieve the goals of AB 32. The foremost objective of CARB is to adopt regulations that require the reporting and verification of statewide GHG emissions. This program would be used to monitor and enforce compliance with the established standards.

CARB is required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 allows CARB to adopt market-based compliance mechanisms to meet the specified requirements. In December 2008, CARB adopted a Scoping Plan to achieve reductions in GHG emissions in California. The plan indicates how reductions in significant GHG sources would be achieved through regulations, market mechanisms, and other actions.

On December 16, 2010, CARB endorsed the long-awaited regulation implementing California's GHG cap-and-trade program. Pursuant to AB 32, and subject to a variety of final actions by the Executive Director and approval by the Office of Administrative Law (OAL), the regulations will be included within Title 17 of the California Code of Regulation, sections 95800-96022, entitled "California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms".

The cap-and-trade program covers approximately 80 percent of the State's total GHG emissions and is considered a key element in achieving the overall strategy set forth in the Scoping Plan. The program, as implemented through the regulation, "caps" GHG emissions by issuing annual allowances (each covering the equivalent of one metric ton of carbon dioxide equivalent [MTCO₂eq¹⁰]) to regulated entities. Covered entities include those that meet the inclusion threshold of 25,000 MTCO₂eq per year and engage in: cement production; cogeneration; glass production; hydrogen production; iron and steel production; lime manufacturing; nitric acid production; oil and natural gas systems; petroleum refining; paper and pulp manufacturing; electricity generating facilities (including operators located in California or electricity importers); and natural gas suppliers. The regulation also allows entities that engage in the above production and manufacturing activities to opt-in even if they do not meet the 25,000 metric ton inclusion threshold. Others may also voluntarily associate into the program. By opening the program to non-covered entities, CARB hopes to create a trading market in which investment banks, citizens groups and the general public would be allowed to hold allowances and would be subject to the registration and reporting requirements. The first compliance phase begins on January 1, 2012 through December 31, 2014, and will cover all major industrial sources, including the electricity industry and large industrial plants that manufacture glass, paper, concrete and other products. The second compliance phase begins On January 1, 2015 through December 31, 2017, and will cover distributors of transportation fuels, natural gas and other fuels. A third compliance period starts on January 1, 2018 through December 31, 2020.

As noted above, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted. In order to advise the Board, CARB staff convened an Environmental Justice Advisory Committee and an Economic and Technology Advancement Advisory Committee.

Executive Order S-3-05. The Executive Order S-3-05 established the following goals: GHG emissions should be reduced to 2000 levels by 2010; GHG emissions should be reduced to 1990 levels by 2020; and GHG emissions should be reduced to 80 percent below 1990 levels by 2050. The Secretary of the California Environmental Protection Agency (the Secretary) is required to coordinate efforts of various agencies in order to collectively and efficiently reduce GHGs. Some of the agencies involved in the GHG reduction plan include Secretary of Business, Transportation, and Housing Agency, Secretary of Department of Food and Agriculture, Secretary of Resources Agency, Chairperson of CARB, Chairperson of the Energy Commission, and the President of the Public Utilities Commission. The Secretary is required to submit a biannual progress report to the Governor and State Legislature disclosing the progress made toward GHG emission reduction targets.

¹⁰ Carbon Dioxide Equivalent (CO₂eq) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

Executive Order S-1-07. On January 18, 2007, California further solidified its dedication to reducing GHGs by setting a new Low Carbon Fuel Standard for transportation fuels sold within the State. Executive Order S-1-07 sets a declining standard for GHG emissions measured in carbon dioxide equivalent gram per unit of fuel energy sold in California. The target of the Low Carbon Fuel Standard is to reduce the carbon intensity of California passenger vehicle fuels by at least ten percent by 2020. The Low Carbon Fuel Standard applies to refiners, blenders, producers, and importers of transportation fuels and would use market-based mechanisms to allow these providers to choose how they reduce emissions during the “fuel cycle” using the most economically feasible methods.

Senate Bill 97. Senate Bill (SB) 97 of 2007 requires the California Office of Planning and Research (OPR) to develop CEQA guidelines for analysis and, if necessary, the mitigation of effects of GHG emissions to the Resources Agency. These guidelines for analysis and mitigation must address, but are not limited to, GHG emissions effects associated with transportation or energy consumption. On December 30, 2009, the Natural Resources Agency adopted the CEQA Guidelines Amendments prepared by OPR, as directed by SB 97. On February 16, 2010, the Office of Administration Law approved the CEQA Guidelines Amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. The CEQA Guidelines Amendments became effective on March 18, 2010. These new guidelines require a survey of existing climate change analyses performed by various lead agencies under CEQA.¹¹

Senate Bill 375. SB 375 requires metropolitan planning organizations (MPOs) to include sustainable communities strategies in their regional transportation plans. The purpose of SB 375 is to reduce GHG emissions from automobiles and light trucks, require CARB to provide GHG emission reduction targets from the automobile and light truck sector for 2020 and 2035 by January 1, 2010, and update the regional targets until 2050. SB 375 requires certain transportation planning and programming activities to be consistent with the sustainable communities strategies contained in the regional transportation plan. The bill also requires affected regional agencies to prepare an alternative planning strategy to the sustainable communities strategies if the sustainable communities strategy is unable to achieve the GHG emissions reduction targets. Governor Schwarzenegger signed and approved SB 375 on September 30, 2008.

SB 375 includes the ability to streamline certain projects which are consistent with an MPO's Sustainable Communities Strategy. CARB released its staff report on proposed regional GHG reduction targets for passenger cars and light trucks as well as its CEQA Functional Equivalent Document on August 9, 2010.

Senate Bills 1078 and 107 and Executive Order S-14-08. SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. Executive Order S-14-08 was signed in November 2008, which expands the state's Renewable Energy Standard to 33 percent renewable power by 2020.

¹¹ http://ceres.ca.gov/ceqa/docs/Adopted_Text_of_SB97_CEQA_Guidelines_Amendments.pdf. Accessed March 2010.

CARB Scoping Plan

December 11, 2008, CARB adopted its Scoping Plan, which functions as a roadmap of CARB's plans to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations.¹² CARB's Scoping Plan contains the main strategies California will implement to reduce CO₂eq emissions by 174 million metric tons (MMT), or approximately 30 percent, from the state's projected 2020 emissions level of 596 MMT of CO₂eq under a business as usual (BAU)¹³ scenario (This is a reduction of 42 MMT CO₂eq, or almost ten percent, from 2002 to 2004 average emissions, but requires the reductions in the face of population and economic growth through 2020).

CARB's Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, commercial and residential, industrial, etc.). CARB used three-year average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. At the time CARB's Scoping Plan process was initiated, 2004 was the most recent year for which actual data was available. The measures described in CARB's Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32.

In *Association of Irrigated Residents, et al. v. California Air Resources Board, et al.*, the Superior Court of California for the County of San Francisco (Superior Court) issued a Final Order on May 20, 2011 that prevents CARB from implementing a statewide GHG regulatory program. Although the court upheld the impact analysis contained in the environmental document for the Scoping Plan, the court found that the analysis of project alternatives was not sufficient for informed decision-making and public review under CEQA. The court found that CARB violated CEQA by failing to fully evaluate possible alternatives to the measures described in the Scoping Plan, and focused specifically on the cap and trade program. The court noted that CEQA requires that CARB undertake a similar analysis of the impacts of each alternative so that the public may know not only why cap and trade was chosen, but also why the alternatives were not.

It should be noted that the Superior Court held in the favor of CARB on all substantive challenges to the State's compliance with AB 32 mandates. The Court stated that "as the agency with technical expertise and the responsibility for the protection of California's air resources, CARB has substantial discretion to determine the mix of measures needed to 'facilitate' the achievement of GHG reductions."¹⁴

On June 1, 2011, CARB filed a notice of appeal with the Court of Appeal, First Appellate District and followed up its appeal with a Petition for a Writ of Supersedeas, asking the First Appellate District to stay the Superior Court's decision. CARB's intent was to clarify the scope of the order, which enjoins CARB's implementation of all measures in the Scoping Plan, including programs like improved energy efficiency, clean car standards, and low-carbon fuel regulations. The First

¹² California Air Resources Board, *Climate Change Scoping Plan, A Framework for Change*, December 2008.

¹³ "Business as Usual" refers to emissions that would be expected to occur in the absence of GHG reductions. See <http://www.arb.ca.gov/cc/inventory/data/forecast.htm>. Note that there is significant controversy as to what BAU means. In determining the GHG 2020 limit, CARB used the above as the "definition." It is broad enough to allow for design features to be counted as reductions.

¹⁴ Superior Court of California, County of San Francisco, *Statement of Decision: Association of Irrigated Residents, et al v. California Air Resources Board*, March 18, 2011.

Appellate District granted CARB's Petition for Writ of Supersedeas, staying the Superior Court's injunction and allowing CARB to move forward with Scoping Plan implementation until the Court of Appeal renders a decision or issues another order. As a result of the lawsuit, CARB has adjusted the implementation schedule for the cap and trade program and compliance obligations have been pushed back.

CARB also released a *Supplement to the AB 32 Scoping Plan Functional Equivalent Document* on June 13, 2011, which is designed to address the CEQA flaws first identified by Superior Court. The Supplement provides an expanded analysis of the five alternatives to the Scoping Plan, including a no project alternative, a variation of the proposed combination of reduction measures proposed in the Scoping Plan, and three alternatives based on specific programs including cap-and-trade, source-specific regulatory requirements, and a carbon fee or tax.

LOCAL

South Coast Air Quality Management District

The SCAQMD adopted a *Policy on Global Warming and Stratospheric Ozone Depletion* in April 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of CFCs, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of HCFCs by the year 2000;
- Develop recycling regulations for HCFCs (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

The legislative and regulatory activity detailed above is expected to require significant development and implementation of energy efficient technologies and shifting of energy production to renewable sources.

City of Seal Beach

The City of Seal Beach does not have any plans, policies, regulations, significance thresholds, or laws addressing climate change at this time.

5.7.3 IMPACT THRESHOLDS AND SIGNIFICANCE CRITERIA

CEQA SIGNIFICANCE CRITERIA

Under Executive Order S-3-05 as well as legislative actions described above, the state of California has identified the effects of GHG emissions as an adverse environmental problem, and has defined GHG reduction goals to mitigate the effects of global climate change. While the emissions of one single project will not cause global climate change, GHG emissions from multiple projects throughout the world could result in a cumulative impact with respect to global climate change.

At this time, a widely accepted threshold for determining the significance of GHG emissions has not been established. Both CARB and the SCAQMD have been working to establish significance thresholds for GHG impacts and have published draft thresholds for review and comment, but no significance thresholds applicable to general projects have been adopted by these agencies.

However, the Office of Planning and Research (OPR) has provided amendments to the state CEQA Guidelines, including Appendix G, to address impacts of GHG emissions, as directed by Senate Bill 97 (2007). The proposed amendments were approved by the California Natural Resources Agency (CRNA) on December 30, 2009 and they became effective on March 18, 2010. The amendments include additions to Appendix G of the CEQA Guidelines as applied below.

California Air Resource Board Significance Thresholds

California is the fifteenth largest emitter of GHGs on the planet, representing about 2 percent of the worldwide emissions. According to climate scientists, California and the rest of the developed world will have to cut emissions by 80 percent from today's levels to stabilize the amount of CO₂ in the atmosphere and prevent the most severe effects of global climate change. This long-range goal is reflected in California Executive Order S-3-05 that requires an 80 percent reduction of GHGs from 1990 levels by 2050. Reducing GHG emissions to 1990 levels means cutting approximately 30 percent from business-as-usual emissions levels projected for 2020, or about 15 percent from today's levels. On a per-capita basis, that means reducing annual emissions of 14 tons of CO₂ equivalent for every man, woman, and child in California down to approximately 10 tons per person by 2020.

Significant progress can be made toward the 2020 goal through existing technologies, and improving the efficiency of energy use. Other solutions involve improving the State's infrastructure, transitioning to cleaner and more secure sources of energy, and adopting 21st century land use planning and development practices. Key elements of California's recommendations for reducing its GHG emissions to 1990 levels by 2020 include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standard;
- Achieving a statewide renewable energy mix of 33 percent;

- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system;
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard;
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State's long term commitment to AB 32 implementation; and
- CARB anticipated 5 million metric tons of CO₂ equivalent (MMT CO₂eq) reduction for Regional Transportation-Related Greenhouse Gas Targets.

To meet the 1990 target established by AB 32, CARB recommends a de minimis (minimal importance) emission threshold of 0.1 MMT annual (100,000 MT per year) CO₂eq per transportation source category.¹⁵ Source categories whose total aggregated emissions are below this level are not proposed for emission reduction requirements in the Scoping Plan but may contribute toward the target via other means. As each regulation to implement the Scoping Plan is developed, CARB and other agencies will consider more specific de minimis levels below which the regulatory requirements would not apply. These levels will consider the cost to comply, especially for small businesses, and other factors. Until approved thresholds and guidelines are adopted at the local and regional level, the proposed de minimis threshold of 100,000 MT CO₂eq per year for transportation sources will be utilized for transportation sources.

CARB's Preliminary Draft Staff Proposal (Staff Proposal) Potential Performance Standards and Measures were released in December 2008. Inside the Staff Proposal, CARB's Potential Performance Standard and Measures included some construction measures. These guideline measures are:

- Provide alternative transportation mode options or incentives for workers to and from worksite on days that construction requires 200 or more workers;
- Recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris by weight (residential) or by weight in volume (commercial); and
- Use recycled materials for at least 20 percent of construction materials based on cost for building materials, based on volume for roadway, parking lot, sidewalk, and curb material. Recycled materials may include salvaged, reused, and recycled content materials.

CARB's Staff Proposal has identified California Energy Commission's (CEC) Tier II Energy Efficiency goals as an appropriate performance standard for energy use. Under State Law, the CEC is required to establish eligibility criteria, conditions for incentives, and rating standards. Thus, the

¹⁵ California Air Resources Board, *Climate Change Proposed Scoping Plan – A Framework for Change*, October 2008.

CEC established energy efficiency standards for homes and commercial structures, and requires new buildings to exceed current building standards by meeting Tier Energy Efficiency goals. Currently, CEC's proposed guidelines for the solar energy incentive program recommend a Tier II goal for residential and commercial projects of a 30 percent reduction in building combined space heating, cooling, and water heating energy compared to the 2008 Title 24 standards.

Existing green building rating systems like Leadership in Energy and Environmental Design (LEED), GreenPoint Rated, the California Green Building Code, and others, contain examples of measures that are likely to result in substantial GHG emission reductions from residential and commercial projects. Performance standards that already exist and have been proven to be effective, at the local, State, national or international level, are preferable. For residential and commercial projects, CARB staff has proposed that the GHG emissions of some projects that meet GHG performance standards might under some circumstances still be considered cumulatively considerable and therefore significant. However, a quantitative criteria threshold for residential and commercial uses has yet to be developed.

South Coast Air Quality Management District Greenhouse Gas Thresholds

Under *CEQA*, the SCAQMD is a commenting responsible agency on air quality and GHG emissions within its jurisdiction or impacting its jurisdiction. However, the SCAQMD does not currently have an adopted GHG significance threshold. Therefore, for the purposes of this Assessment, the Bay Area Air Quality Management District (BAAQMD) GHG significance thresholds have been utilized, as they are conservative in nature and have been vetted through a public review process.¹⁶ The BAAQMD's approach to developing a threshold of significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move us towards climate stabilization. If a project would generate GHG emissions above the threshold level, it would be considered to contribute substantially to a cumulative impact, and would be considered significant.

According to the BAAQMD *CEQA Air Quality Guidelines*, a project would result in operational GHG impacts if the project exceeds 1,100 MT CO₂eq/yr or 4.6 MT CO₂eq/service population (SP)/yr. As the proposed project does not have a substantial SP (residents plus employees associated with the project), the 1,100 MT CO₂eq/yr threshold has been utilized for this analysis to determine the GHG impacts of the proposed project.

The BAAQMD (nor any other air district in the State) does not have an adopted threshold of significance for construction-related GHG emissions. However, the BAAQMD *CEQA Air Quality Guidelines* recommend the quantification and disclosure of construction GHG emissions. The SCAQMD recommends Lead Agencies sum and amortize construction GHG emissions over the lifetime of the project (assumed to be 30 years), then add the amortized emissions to the operational emissions.¹⁷ The BAAQMD also recommends that the Lead Agency should make a determination on the significance of these construction generated GHG emission impacts in relation to meeting AB 32 GHG reduction goals, as required by the Public Resources Code, Section 21082.2. The Lead

¹⁶ <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>.

¹⁷ The project lifetime is based on the standard 30 year assumption of the South Coast Air Quality Management District (<http://www.aqmd.gov/hb/2008/December/081231a.htm>).

Agency is encouraged to incorporate best management practices to reduce GHG emissions during construction, as feasible and applicable.

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by Appendix G of the *CEQA Guidelines*, as amended, and used by the City of Seal Beach in its environmental review process. The Initial Study Checklist includes questions relating to air quality. The issues presented in the Initial Study Checklist have been utilized as thresholds of significance in this section. Accordingly, a project may create a significant adverse environmental impact if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (refer to Impact Statement GHG-1); and/or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases (refer to Impact Statement GHG-2).

5.7.4 IMPACTS AND MITIGATION MEASURES

GREENHOUSE GAS EMISSIONS

GHG-1 GREENHOUSE GAS EMISSIONS GENERATED BY THE PROJECT WOULD NOT HAVE A SIGNIFICANT IMPACT ON GLOBAL CLIMATE CHANGE.

Impact Analysis: Direct project-related GHG emissions for “business as usual” conditions include emissions from construction activities, area sources, and mobile sources. Table 5.7-1, *Business As Usual Greenhouse Gas Emissions*, presents the estimated CO₂, N₂O, and CH₄ emissions. The CalEEMod computer model outputs contained within the Appendix 11.6, *Air Quality/Greenhouse Gas Emissions Data*, were used to calculate mobile source, area source, and construction GHG emissions. Operational GHG estimations are based on energy emissions from natural gas usage, electricity consumption, water demand, wastewater generation, solid waste generation, and automobile emissions. GHGs associated with area sources and mobile sources would be 36.26 MTCO₂eq/yr and 171.45 MTCO₂eq/yr, respectively. GHG emissions from construction would result in 967.50 MTCO₂eq for the development of the residential and park/open space uses. Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions.¹⁸ Total project-related direct operational emissions would result in 785.96 MTCO₂eq/yr.

Indirect Project Related Sources of Greenhouse Gases

Energy Consumption. Energy Consumption emissions were calculated using the CalEEMod model and project-specific land use data. Electricity would be provided to the project site via Southern California Edison. The project would indirectly result in 199.64 MTCO₂eq/year due to energy consumption; refer to Table 5.7-1.

¹⁸ Ibid.

**Table 5.7-1
Business As Usual Greenhouse Gas Emissions**

Source	CO ₂	CH ₄		N ₂ O		Total Metric Tons of CO ₂ eq
	Metric Tons/yr ¹	Metric Tons/yr ¹	Metric Tons of CO ₂ eq ²	Metric Tons/yr ¹	Metric Tons of CO ₂ eq ²	
Direct Emissions						
▪ Construction (amortized over 30 years)	32.16	0.00	0.09	0.00	0.00	32.25
▪ Area Source	35.69	0.02	0.42	0.00	0.15	36.26
▪ Mobile Source	716.84	0.03	0.61	0.00	0.00	717.45
Total Direct Emissions³	784.69	0.05	1.12	0.00	0.15	785.96
Indirect Emissions						
▪ Energy	198.41	0.01	0.21	0.00	1.02	199.64
▪ Solid Waste	11.51	0.68	14.30	0.00	0.01	25.80
▪ Water Demand	42.89	0.10	2.10	0.00	0.91	45.90
Total Indirect Emissions³	252.81	0.79	16.61	0.00	1.94	271.34
Total Project-Related Emissions³	1,057.30 MTCO₂eq/yr					
Notes:						
1. Emissions calculated using CalEEMod computer model.						
2. CO ₂ Equivalent values calculated using the EPA Website, <i>Greenhouse Gas Equivalencies Calculator</i> , http://www.epa.gov/cleanenergy/energy-resources/calculator.html , accessed August 2011.						
3. Totals may be slightly off due to rounding.						
Refer to Appendix 11.6, <i>Air Quality/Greenhouse Gas Emissions Data</i> , for detailed model input/output data.						

Solid Waste. Solid waste associated with operations of the proposed project would result in 25.80 MTCO₂eq/year; refer to Table 5.7-1.

Water Demand. The City would be the main water supply provider to the proposed project. The project's water supply would be provided by imported sources and local groundwater. Emissions from indirect energy impacts due to water supply would result in 45.90 MTCO₂eq/year.

Total Project-Related Sources of Greenhouse Gases. As shown in Table 5.7-1, the total amount of project-related "business as usual" GHG emissions from direct and indirect sources combined would total 1,057.30 MTCO₂eq/yr which are below the 1,100 MTCO₂eq/yr GHG threshold.

Project Design Features

Although the project's GHG emissions are below the 1,100 MTCO₂eq/yr GHG threshold, the project includes project design features that would further reduce project-related GHG emissions. The project design features and associated GHG reductions were applied using the CalEEMod model. Table 5.7-2, Reduced Greenhouse Gas Emissions, shows the reduced GHG emissions associated with the project design features regarding transportation, energy, area source, and water efficiency measures.

**Table 5.7-2
Reduced Greenhouse Gas Emissions**

GHG Source	Business As Usual GHG Emissions (Metric Tons of CO ₂ eq/yr) ¹	Project Design Feature Applied in CalEEMod	Reduced GHG Emissions (Metric Tons of CO ₂ eq/yr) ¹
Mobile	717.45	Increase Density	669.39
		Increase Transit Accessibility (project located 0.12 miles from bus stop)	
		Improve Pedestrian Network (project includes walkways on-site connecting to off-site sidewalk system)	
		Improve Walkability Design (120 intersections per square mile)	
		Improve Destination Accessibility (0.52 miles to downtown/job center)	
Energy	199.64	Install High Efficiency Lighting	184.15
		Install Energy Efficient Appliances	
Water	45.90	Install Low Flow Bathroom Faucets	41.06
		Install Low Flow Toilets	
		Install Low Flow Kitchen Faucets	
		Install Low Flow Showers	
		Use Water Efficient Irrigation Systems	
Area	36.26	No Hearths Installed	1.22
Waste	25.80	N/A	25.80
Construction	32.25	N/A	32.25
TOTAL	1,057.30	N/A	953.87
Notes:			
1. Emissions calculated using CalEEMod computer model.			
Refer to Appendix 11.6, <i>Air Quality/Greenhouse Gas Emissions Data</i> , for detailed model input/output data.			

Consistency With Greenhouse Gas Emission Reduction Strategies

The proposed project's design features would also be consistent with the California Office of the Attorney General's recommended measures to reduce GHG emissions. A list of the Attorney General's recommended measures and the proposed project's compliance with each applicable measure are listed in Table 5.7-3, *Project Consistency with the GHG Emissions Reduction Strategies*. It should be noted that these measures are recommendations from the California Attorney General's Office and are not legally mandated or part of a statewide GHG reduction strategy.

**Table 5.7-3
Project Consistency with GHG Emissions Reduction Strategies**

Project Design Feature	Project Applicability
Energy Efficiency	
Install energy efficient lighting (e.g., light emitting diodes [LEDs]), heating and cooling systems, appliances (e.g., faucets, dishwasher, clothes washer, fan, refrigerator), equipment, and control systems.	Compliant. The proposed project would comply with the updated Title 24 standards for building construction. In addition, future dwelling units would incorporate energy-efficient clothing washers, dishwashers, ceiling fans, and refrigerators.
Install efficient lighting, (including LEDs) for traffic, street and other outdoor lighting.	
Incorporate green building practices and design elements.	
Reduce unnecessary outdoor lighting.	Compliant. The proposed project would only include lighting necessary to ensure safety, and would not be excessive.
Water Conservation and Efficiency	
Incorporate water-reducing features into building and landscape design.	Compliant. The project proposes to incorporate water-efficient landscapes into the project design. Watering methods would be restricted and runoff would be controlled in accordance with Municipal Code Chapter 9.35 (Water and Water Conservation). Water-efficient irrigation systems and devices would be installed throughout the project site. The project would be required to comply with water conservation measures within Municipal Code Chapter 9.70 (Water Efficient Landscaping) and Chapter 9.35. The project would also include low-flow faucets, toilets, and showers.
Create water-efficient landscapes (e.g., turf reduction area, gal/yr maximum applied water allowance, gal/yr estimated total water use).	
Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls and use water-efficient irrigation methods.	
Solid Waste Measures	
Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).	Compliant. The project would reuse and recycle construction and demolition waste during project construction activities to the extent feasible. The project would be subject to City and County recycling programs. The project would also provide exterior storage areas for recyclables in public areas throughout the project site.
Provide easy and convenient recycling opportunities for residents, the public, and tenant businesses.	
Land Use Measures	
Ensure consistency with "smart growth" principles – mixed-use, infill, and higher density projects that provide alternatives to individual vehicle travel and promote the efficient delivery of services and goods.	Compliant. The proposed project is considered to be an infill project, as it would facilitate development on an underutilized and previously disturbed site in the City located near existing transit.
Develop "brownfields" and other underused or defunct properties near existing public transportation and jobs.	
Incorporate public transit into the project's design.	Compliant. The project site is served by bus transit lines operated by Long Beach Transit Line A. The nearest transit stop to the project site is located at the corner of Marina Drive and North Marina Drive, approximately 0.12 miles to the northwest. Additionally, Long Beach Transit Lines 131 and 171 and Orange County Transportation Authority (OCTA) Line 1 stop at the corner of Pacific Coast Highway and Marvista Drive, and the corner of Pacific Coast Highway and 5 th Street, both approximately 0.40 miles east of the project site.
Ensure that the project enhances, and does not disrupt or create barriers to, non-motorized transportation.	Compliant. The project would include sidewalks and paths connecting the project site to the surrounding circulation network.
Protect existing trees and encourage the planting of new trees. Adopt a tree protection and replacement ordinance.	Compliant. Trees would be planted throughout the project site.
Source: State of California Department of Justice, Attorney General's Office, <i>Addressing Climate Change at the Project Level</i> , updated January 6, 2010.	

Conclusion

As shown in Table 5.7-1, operational-related “business as usual” emissions would be 1,057.30 MTCO₂eq/yr, which are below the 1,100 MTCO₂eq/yr threshold. The project’s transportation, energy, area source, and water efficiency design features would further reduce project-related GHG emissions as presented in Table 5.7-2. These measures are consistent with the Attorney General’s recommended design features, and would reduce GHG emissions to 953.87MTCO₂eq/yr. Therefore, the proposed project would result in a less than significant impact with regards to GHG emissions.

Mitigation Measures: No mitigation measures are required.

Level of Significance: Less Than Significant Impact.

CONSISTENCY WITH APPLICABLE GHG PLANS, POLICIES, OR REGULATIONS

GHG-2 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD NOT CONFLICT WITH AN APPLICABLE GREENHOUSE GAS REDUCTION PLAN, POLICY, OR REGULATION.

Impact Analysis: The City does not currently have an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As concluded in Impact Statement GHG-1 the proposed project would not generate a significant amount of GHGs in an unmitigated condition. GHG emissions would be further reduced with implementation of project design features. The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts are less than significant in this regard.

Mitigation Measures: No mitigation measures are required.

Level of Significance: Less Than Significant Impact.

5.7.5 CUMULATIVE IMPACTS

The basis for cumulative analysis is presented in Section 4.0, *Basis of Cumulative Analysis*. Cumulative projects identified as having the potential to interact with the proposed project to the extent that a significant cumulative effect could occur include the:

- Fresh ‘n Easy Project;
- Marina Park Development;
- River’s End Staging Area and San Gabriel River Bikeway Enhancement Plan; and
- 2nd Street and Pacific Coast Highway Project.

The following discussions are included per topic area to determine whether a significant cumulative effect would occur.

GREENHOUSE GAS EMISSIONS

■ GREENHOUSE GAS EMISSIONS GENERATED BY THE PROJECT WOULD NOT HAVE A SIGNIFICANT IMPACT ON GLOBAL CLIMATE CHANGE.

Impact Analysis: As stated above, the proposed project would not result in a significant impact regarding GHG emissions, as the project would result in 1,057.30 MTCO₂eq/yr under buildout “business as usual” conditions and 953.87 MTCO₂eq/yr with implementation of project design features. Therefore, project related GHG impacts were determined to be less than significant as they were below the 1,100 MTCO₂eq threshold. The background and formulation of the GHG threshold that was utilized is described under Section 5.7.3, *Impact Thresholds and Significance Criteria*.

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory.¹⁹ GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.²⁰ The additive effect of project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. For the reasons discussed in this section and because the project incorporates GHG reduction measures and design features, the project’s cumulative GHG emissions would have a less than significant impact on the environment.

Mitigation Measures: No mitigation measures are required.

Level of Significance After Mitigation: Less Than Significant Impact.

CONSISTENCY WITH APPLICABLE GHG PLANS, POLICIES, OR REGULATIONS

■ IMPLEMENTATION OF THE PROPOSED PROJECT WOULD NOT CONFLICT WITH AN APPLICABLE GREENHOUSE GAS REDUCTION PLAN, POLICY, OR REGULATION.

Impact Analysis: There are no applicable plans, policies, or regulations that have been adopted by the City for the purpose of reducing the emissions of GHGs. Therefore, the proposed project would not result in a cumulatively considerable impact with regard to a conflict with such documents. Therefore, a less than significant impact would occur in this regard.

Mitigation Measures: No mitigation measures are required.

Level of Significance After Mitigation: Less Than Significant Impact.

¹⁹ California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, 2008.

²⁰ Ibid.

5.7.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No unavoidable significant impacts related to GHG emissions have been identified in this section.